

24 MS. SWARTZ: My name is Ginger Swartz and I
NOV 09 1999
25 represent the Office of the Governor, Nevada Agency for Nuclear
1 Projects. My task this evening is to make a presentation
2 statement on behalf of Robert Loux, the executive director of
3 that agency.

4 The Draft Environmental Impact Statement for the
5 proposed Yucca Mountain Repository Program and the public
6 process by which the US Department of Energy is seeking to
7 obtain public comments on the draft document are deficient in
8 both substance and legality.

1 9 Among other deficiencies, [the Draft EIS does not
2 10 contain an accurate description of the project.] [It postulates
11 a no action alternative that is unrealistic and unreasonable.]

3 12 [It fails to adequately evaluate the health,
13 safety and environmental impacts of a program that will
14 intentionally as part of the so-called waste isolation strategy
15 contaminate a groundwater source that is currently and will be
16 in the future used by people for drinking, food production and
17 other means.]

4 18 [It fails to adequately assess cumulative impacts
19 from past, current and future activities as the Nevada Test
20 Site.]

5 21 [It fails to identify spent fuel and high-level
22 waste shipping modes and routes in a way that will permit the
23 people in affected communities to participate in the review and
6 24 public comment process], and [it completely ignores the potential
25 for major and widespread socioeconomic impacts from the
1 project, both in Nevada and in cities and communities
2 throughout the nation.]

7 3 [With respect to Caliente, Lincoln County and

4 Eastern Nevada, the Draft EIS ignores issues and impacts
5 associated with potential cumulative effects of radiation
6 exposures from atmospheric releases associated with the testing
7 of nuclear weapons.

8 As a downwind region, Lincoln County, the City of
9 Caliente and other parts of Eastern Nevada were regularly
10 exposed to exposures from fallout, first as a result of above-
11 ground atomic testing, and later as a consequence of
12 containment failures involving underground tests.

13 The Draft EIS should have comprehensively
14 evaluated the potential health effects of these past exposures
15 in light of the cumulative exposures that would occur as a
16 result of the operations of a repository and the transportation
17 of spent fuel and high-level radioactive waste through Caliente
18 and through Eastern Nevada communities.

19 Especially significant are potential impacts to
20 current residents who were either present during radiation
21 exposures from testing activities or who are in any way
22 genetically related to residents who were so exposed.

8 23 Likewise, the Draft EIS fails to adequately
24 evaluate the range of impacts associated with the location and
25 operations of an intermodal transfer facility in Caliente and
1 with the transportation of spent fuel and high-level waste from
2 Caliente to Yucca Mountain.

3 Mr. Robert Halstead, the transportation advisor
4 for the Nevada Agency for Nuclear Projects will address these
5 issues as the next speaker.

9 6 The Draft EIS ignores a robust and extensive body
7 of research produced by the State of Nevada, by independent
8 researchers and even by DOE contractors that clearly

9 cont'd.

9 demonstrates the socioeconomic risks and potential impacts
10 associated with the repository and repository related spent
11 fuel and high-level waste transportation.

12 It is well documented that people react strongly
13 and negatively to nuclear waste facilities and activities. In
14 fact, nuclear waste is consistently ranked among the highest
15 risks to be encountered.

16 In response to such perceptions, people behave in
17 ways that have direct and measurable economic consequences such
18 as avoidance of places and products associated with that
19 nuclear industry or that stigma.

20 The Draft EIS -- EIS ignores this finding and
21 does not consider the socioeconomic consequences of such stigma
22 to cities such as Las Vegas and other tourist destinations and
23 to rural communities like Caliente and Lincoln County.]

24 The State of Nevada will be submitting extensive
25 written comments on this Draft EIS. It is our hope that these
1 comments and those of all others will be seriously considered
2 and that a reasonable no action alternative as opposed to the
3 unreasonable and unrealistic no action alternatives contained
4 in the draft document will be selected as the preferred action
5 in the Final EIS

6 Thank you.

7 And I would also like to take one moment to thank
8 the elected officials of Lincoln County for speaking. I feel
9 this is extremely important that elected officials continue to
10 come forward during these hearings.